

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

April 11 2018  
WILLIAM M. MCCOOL, Clerk  
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
THOMAS MAHONEY,  
  
Defendant.

**CR18-090 JCC**  
**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Travel with Intent to Engage in a Sexual Act with a Minor)**

On or about November 29, 2016, in the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to wit from Seattle, Washington, to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined in 18 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Section 2423(b).

**COUNT 2**

**(Travel with Intent to Engage in a Sexual Act with a Minor)**

On or about May 15, 2017, in the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to wit from Seattle, Washington, to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined in 18 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Section 2423(b).

**COUNT 3**

**(Travel with Intent to Engage in a Sexual Act with a Minor)**

On or about August 31, 2017, in the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY, did knowingly travel in interstate commerce, to wit from Seattle, Washington, to the State of California, for the purpose of engaging in illicit sexual conduct, that is, a sexual act, as that term is defined in 18 U.S.C. § 2246, with a person under the age of eighteen, namely MV, which sexual act would constitute a violation of Title 18, United States Code, Chapter 109A.

All in violation of Title 18, United States Code, Section 2423(b).

**COUNT 4**

**(Production of Child Pornography)**

On a date unknown but no later than May 9, 2017, at Seattle, within the Western District of Washington, and elsewhere, the defendant, THOMAS MAHONEY knowingly employed, used, persuaded, induced, enticed, and coerced MV, a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported using any means and facility of interstate and foreign commerce.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

**ALLEGATIONS OF FORFEITURE**

Upon conviction of the offenses alleged in Counts 1 through 4 of this Indictment, THOMAS MAHONEY shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any property, real or personal, used or intended to be used to commit or promote the commission of such offenses, or any property traceable to such property, and any and all visual depictions as described in Title 18, United States Code, Sections 2251, which were produced, transported, mailed, shipped, or received, in violation of Chapter 110, Title 18, United States Code, including but not limited to:

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- a. Any and all images of child pornography, in whatever format and however stored;
- b. Lenova Laptop;
- c. Dell Inspiron Laptop;
- d. Samsung Galaxy S7 Cell Phone;
- e. Samsung Galaxy S8 Cell Phone; and
- f. ~~Cyberpower C Series.~~

A TRUE BILL:

DATED: 11 April 2018

*Signature of the foreperson is redacted pursuant to the policy of the Judicial Conference of the United States*

FOREPERSON

  
ANNETTE L. HAYES  
United States Attorney

  
KATHRYN FRIERSON  
Assistant United States Attorney

  
CECELIA Y. GREGSON  
Assistant United States Attorney